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## ACTION

DIST. LTR ENC

ENEDETTI, R.L. ☒ ☒  
ENJAMIN, A. ☒  
ERMAN, H.S. ☒  
ARNIVAL, G.J. ☒  
OPP, R.D. ☒  
ORDOVA, R.C. ☒  
AVIS, J.G. ☒  
ERRERA, D.W. ☒  
RANZ, W.A. ☒  
ANNI, B.J. ☒  
EALY, T.J. ☒  
EDAH, T.G. ☒  
ILBIG, J.G. ☒  
IRBY, W.A. ☒  
JESTER, A.W. ☒  
ANN, H.P. ☒  
ARX, G.E. ☒  
KENNA, F.G. ☒  
ORGAN, R.V. ☒  
ZZUTO, V.M. ☒  
OTTER, G.L. ☒  
ILEY, J.H. ☒  
ANDLIN, N.B. ☒  
ATTERWHITE, D.G. ☒  
CHUBERT, A.L. ☒  
ETLOCK, G.H. ☒  
JLLIVAN, M.T. ☒  
WANSON, E.R. ☒  
ILKINSON, R.B. ☒  
ILSON, J.M. ☒

Guillaume ☒ ☒Taylor ☒ ☒ORRES CONTROL ☒ ☒  
ATS/130GReviewed for Addressee  
Corres. Control RFP7-19-93  
DATE BY

Ref Ltr. #

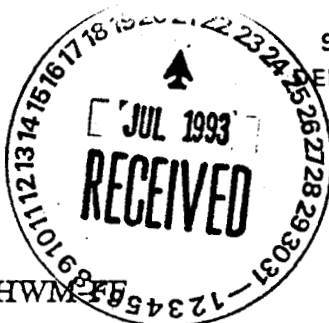
DOE ORDER #

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

JUL 15 1993



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EG&G PLANT  
CORRESPONDENCE CONTROL

JUL 19 3 30 PM '93

Ref: 8HWM-88-88  
Mr. Richard Schassburger  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Dear Mr. Schassburger:

Enclosed please find EPA's comments on draft Technical Memorandum No. 2, Operable Unit 3 (OU-3), Exposure Scenarios. We found that many potential routes of exposure were omitted without adequate justification. Part of the problem may be that contaminants of concern have not yet been chosen for OU-3 causing the elimination of exposure pathways to seem premature and arbitrary. Even if it is ultimately demonstrated through the baseline risk assessment process that some of these pathways do not represent significant human health risks, analysis of all potentially complete pathways must be included in the risk assessment for the purpose of public disclosure.

Until agreement can be reached between DOE, EPA, and CDH that the exposure pathways and parameters indicated in the enclosed comments will be included in the baseline risk assessment for OU-3, Technical Memorandum No. 2 cannot be approved. We suggest that representatives of EPA, CDH, and DOE meet as soon as possible to resolve the issues raised in our comments and those of CDH. Adequate documentation of the specific changes which will be incorporated into the baseline risk assessment to address these comments will eliminate the requirement for re-submittal of Technical Memorandum No. 2. Please advise us of a meeting date and time. Our point of contact is Bonnie Lavelle, (303) 294-1067.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Project

cc: Gary Baughman, CDH  
Carl Spreng, CDH  
Bob Birk, DOE  
Michael Guillaume, EG&G